

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE/BRYSON CITY DIVISION**

**IN RE:**

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# **PAIN MANAGEMENT ASSOCIATES OF NORTH CAROLINA, P.C.**

## Debtor.

CASE NO.: 20-10138  
CHAPTER 7

**APPLICATION TO AUTHORIZE**  
**TRUSTEE'S LAW FIRM TO ACT AS**  
**ATTORNEY FOR TRUSTEE**

TO THE HONORABLE GEORGE R. HODGES, UNITED STATES BANKRUPTCY JUDGE:

The Applicant, Robert A. Mays, respectfully shows:

1. He is the duly appointed and now acting Trustee in Bankruptcy for the above-referenced Debtor, having been appointed by the United States Bankruptcy Court for the Western District of North Carolina.
2. Applicant requires the assistance of counsel for the following purposes:
  - a. Review and interpretation of legal documents;
  - b. Research of legal issues involved in this bankruptcy estate;
  - c. Preparation of legal document required by Trustee; and
  - d. Representation of Trustee before the Court
3. It is in the best interest of this estate and its economical administration that your Applicant and The Mays Law Firm, PLLC, a law firm of which Application is a member, be authorized to act as attorney for the estate.
4. The Court has the power to authorize said employment pursuant to 11 U.S.C. § 327(a) and (d). Section 327(d) reads as follows:

**“The court may authorize the trustee to act as attorney or accountant for the estate if such Authorization is in the best interest of the estate.”**

5. Applicant is duly admitted to practice before this Court and other necessary state and federal courts in this jurisdiction and has a particular expertise with regard to bankruptcy, corporate

reorganization, and debtor/creditor matters in cases under the Bankruptcy Code.

6. The normal billing rate of applicant's law firm at the time of this Application is \$300.00 per hour for Mr. Mays and \$100.00 per hour for paraprofessionals. It is contemplated that the law firm will seek compensation based upon normal and usual hourly billing rates, plus reimbursement of actual and necessary expenses. It is further contemplated that said law firm will seek interim compensation as permitted by 11 U.S.C. § 331.

WHEREFORE, Robert A. Mays of The Mays Law Firm, PLLC prays that Applicant, and the law firm of which he is a member, be authorized to act as attorney for the estate with compensation for such legal services to be paid as an administrative expense in such amounts as this Court may hereafter determine and allow.

THIS the 18<sup>th</sup> day of May, 2020.

/s/Robert A. Mays

Robert A. Mays  
N.C. State Bar No. 34090  
The Mays Law Firm, PLLC  
21 Battery Park Ave, Ste 201  
Tel.: (828) 435-3335  
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**DECLARATION OF ROBERT A. MAYS**

I, Robert A. Mays, declare:

1. I am a member of The Mays Law Firm, PLLC, and I am the trustee in this case.
2. I am duly admitted to practice before this Court and other necessary state and federal courts in this jurisdiction.
3. To the best of my knowledge, information and belief, this law firm, its members, and its associates are a disinterested person with the meaning of 11 U.S.C § 101(13), and are eligible to serve as counsel for the estate and the Trustee pursuant to the provisions of 11 U.S.C. § 327(a) and (d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 18<sup>th</sup> day of May, 2020.

*/s/Robert A. Mays*

Robert A. Mays